## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

PENNSYLVANIA EMPLOYEES BENEFIT TRUST FUND, on behalf of itself and all others similarly situated.

Plaintiff,

: Civil Action No. 1:05-cv-75 (SLR) VS.

ZENECA, INC.; and ASTRAZENECA PHARMACEUTICALS, L.P.,

Defendants.

LINDA A. WATTERS, Commissioner, Offices of Financial and Insurance Services for the State of Michigan: in her capacity as Rehabilitator of The Wellness Plan and : in her capacity as Liquidator of Michigan Health Maintenance Organization Plans, Inc., formerly known as: OmniCare Health Plan, Inc., individually and on behalf of: Civil Action No. 1:05-cv-196 (SLR)

Plaintiff,

VS.

all others similarly situated

ASTRAZENECA PHARMACEUTICALS, LP, and ZENECA, INC.,

Defendants.

(additional case caption appears on next page)

PLAINTIFFS' UNOPPOSED MOTION IN SUPPORT OF ENTRY OF [PROPOSED] PRETRIAL ORDER NO. 1

JOSEPH MACKEN, on behalf of himself and all others similarly situated,

Plaintiff,

VS.

Civil Action No. 1:05-cv-220 (SLR)

ASTRAZENECA PHARMACEUTICALS LP; AND ZENECA, INC.,

Defendants.

Plaintiffs in the above-captioned actions hereby move this Court for entry of the attached [Proposed] Pretrial Order No. 1 ("PTO No. 1"). Defendants have agreed to the form and content of PTO No. 1, and have been provided with a copy of this motion. Plaintiffs have been authorized to represent that Defendants do not oppose this motion or the entry of PTO No. 1.

Concurrently with this motion, Plaintiffs are filing a notice withdrawing their April 22, 2005 motion for entry of an earlier iteration of PTO No. 1 (the "Withdrawn Motion"). The Withdrawn Motion includes as exhibits the resumes of the firms to be appointed, per the attached PTO No. 1, as interim co-lead, liaison and allocation counsel on behalf of Plaintiffs and the putative class they seek to represent. Rather than burden the Court with additional identical copies of those documents. Plaintiffs respectfully refer the Court to Exhibits 2 through 7 of their brief in support of the Withdrawn Motion as support for the entry of PTO No. 1.

Dated: May 5, 2005.

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